David C. McGrail dmcgrail@mcgrailbensinger.com MCGRAIL & BENSINGER LLP 888-C 8<sup>th</sup> Avenue #107 New York, New York 10019 Tel: (646) 285-8476

-and-

Douglas R. Gooding dgooding@choate.com
J.P. Jaillet
jjaillet@choate.com
CHOATE, HALL AND STEWART LLP
Two International Place
Boston, Massachusetts 02110
Tel: (617) 248-5000

Co-counsel for Defendant, General Electric Company

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

SUNEDISON, INC., et al.,

Reorganized Debtors.

Case No. 16-10992 (SMB)

(Jointly Administered)

SUNEDISON LITIGATION TRUST,

Plaintiff,

Adv. Pro. No. 18-01433

– against –

GENERAL ELECTRIC COMPANY,

Defendant.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned adversary proceeding as co-counsel to defendant, General Electric Company ("GE"), and pursuant to Rules

18-01433-smb Doc 21 Filed 05/10/19 Entered 05/10/19 10:28:19 Main Document Pg 2 of 3

2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Section 1109(b) of Title 11

of the United States Code, 11 U.S.C. §§ 101, et seq. (the "Bankruptcy Code"), respectfully

request that notices, pleadings, and other papers served or required to be served herein also be

served, via e-mail only, upon:

David C. McGrail, Esq.

McGrail & Bensinger LLP

Email: dmcgrail@mcgrailbensinger.com

-and-

Douglas R. Gooding, Esq.

Choate, Hall and Stewart LLP

Email: dgooding@choate.com

-and-

J.P. Jaillet, Esq.

Choate, Hall and Stewart LLP

Email: *ijaillet@choate.com* 

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the

Bankruptcy Code, the foregoing request includes the notice of all orders, applications, motions,

petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or

oral, transmitted or conveyed by mail, hand-delivery, telephone, facsimile transmission, email, or

otherwise made with regard to the referenced case and proceedings herein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and

Request for Service of Papers (the "Notice") nor any later appearance, pleading, proof of claim,

claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters

entered only after de novo review by a district judge, (ii) the right to trial by jury in any

proceeding related to, or triable in, these cases or any case, controversy or proceeding related to

these cases, (iii) the right to have the district court withdraw the reference in any matter subject

-2-

18-01433-smb Doc 21 Filed 05/10/19 Entered 05/10/19 10:28:19 Main Document Pg 3 of 3

to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments expressly are reserved.

DATED: May 10, 2019

New York, New York

## MCGRAIL & BENSINGER LLP

/s/ David C. McGrail

David C. McGrail, Esq. 888-C 8<sup>th</sup> Avenue #107

New York, New York 10019 Telephone: (646) 285-8476

Facsimile: (646) 224-8377

dmcgrail@mcgrailbensinger.com

Attorney for Defendant, General Electric Company